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10 Attorneys for Defendants
11 CATLIN SPECIALTY INSURANCE COMPANY,
GREENWICH INSURANCE COMPANY,
12 and XL INSURANCE AMERICA, INC.

13
14 UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA

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17 EMPLOYERS MUTUAL CASUALTY
COMPANY, an IOWA CORPORATION,

18 Plaintiff,

19 vs.
20 ZURICH AMERICAN INSURANCE
COMPANY, an ILLINOIS CORPORATION;
CATLIN SPECIALTY INSURANCE
COMPANY, a DELAWARE
CORPORATION; GREENWICH
INSURANCE COMPANY, a DELAWARE
CORPORATION, XL INSURANCE
AMERICA, INC., a DELAWARE
CORPORATION and DOES 1 through 250,
26 inclusive,

27 Defendants.

CASE NO.: 2:18-cv-00089-JCM_PAL

JOINT MOTION FOR EXTENSION OF
TIME FOR DEFENDANTS
CATLIN SPECIALTY INSURANCE
COMPANY, GREENWICH INSURANCE
COMPANY, AND XL INSURANCE
AMERICA, INC., TO FILE RESPONSE TO
COMPLAINT

(FIRST REQUEST)

1 Defendants CATLIN SPECIALTY INSURANCE COMPANY, GREENWICH
2 INSURANCE COMPANY, and XL INSURANCE AMERICA, INC., (collectively "Defendants")
3 by and through their attorneys, Duane Morris LLP, and Plaintiff EMPLOYERS MUTUAL
4 CASUALTY COMPANY ("Plaintiff"), by and through its attorneys, The Grad Law Firm, hereby
5 jointly request that this Court grant this joint motion, in compliance with LR IA 6-1 and LR 7-1,
6 and provide Defendants a 30-day extension of time, until February 22, 2018, to file a responsive
7 pleading to the Complaint.

8 In support of this joint motion the Parties state:

- 9 1. On or about January 16, 2018, prior to Defendants responding to Plaintiff's complaint, a
10 Notice of Removal was filed by defendant Zurich American Insurance Company, which
11 Defendants joined, and this action was removed from the Clark County District Court, case
12 no. A-17-76603-C, to this Court;
- 13 2. Pursuant to Fed. R. Civ. P. 81(c)(2)(c), a defendant who did not respond to the complaint
14 before removal has seven (7) days to file a responsive pleading from when a Notice of
15 Removal was filed, making a response due January 23, 2018;
- 16 3. Counsel for Defendants were recently retained by Defendants and need additional time to
17 evaluate this matter before preparing a responsive pleading;
- 18 4. The Parties have consented to a 30-day extension; and
- 19 5. No party will be prejudiced by permitting Defendants to have an extension of time to file a
20 responsive pleading to the Complaint.

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1 WHEREFORE, the Parties respectfully request that the Court grant a 30-day extension of
2 time, until **February 22, 2018**, to allow Defendants to file a responsive pleading to the Complaint.

3
4 THE GRAD LAW FIRM

5 By /s/ Laleaque Grad
6 Laleaque Grad, Bar No. 8475

7 Attorneys for Plaintiff
8 EMPLOYERS MUTUAL CASUALTY
9 COMPANY

DUANE MORRIS LLP

By /s/ Tyson E. Hafen
Tyson E. Hafen, Bar No. 13139

Attorneys for Defendants
CATLIN SPECIALTY INSURANCE
COMPANY, GREENWICH INSURANCE
COMPANY, and XL INSURANCE
AMERICA, INC.

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11 IT IS SO ORDERED.

12 DATED: February 5, 2018


13 U.S. MAGISTRATE JUDGE

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JOINT MOTION

CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2018, I served via CM/ECF and/or deposited for mailing in the U.S. Mail a true and correct copy of the foregoing **JOINT MOTION FOR EXTENSION OF TIME FOR DEFENDANTS CATLIN SPECIALTY INSURANCE COMPANY, GREENWICH INSURANCE COMPANY, AND XL INSURANCE AMERICA, INC., TO FILE RESPONSE TO COMPLAINT**, (postage prepaid if by U.S. Mail) and addressed to all parties and counsel as identified on the CM/ECF-generated Notice of Electronic Filing.

/s/ Jana Dailey

Jana Dailey

An employee of DUANE MORRIS LLP